

LDM:KKO
F. #2017R01840

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

Criminal Docket No. 18-204 (S-1) (NGG)

KEITH RANIERE, *et al.*

Defendants.

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The United States of America, by and through RICHARD P. DONOGHUE, United States Attorney for the Eastern District of New York, and Karin Orenstein, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Superseding Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B), 982(b)(1), 1028(b)(5), 1594(d) and 1963; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that, in addition to the forfeiture allegations in the above-captioned Superseding Indictment and Bill of Particulars filed on August 8, 2018 (DE # 92), the United States seeks forfeiture of the following property pursuant to Title 18, United States Code, Section 1594(d)(1) as to Counts Two, Four, Five and Six of the Superseding Indictment: (i) fifteen thousand six hundred seventy dollars and zero cents (\$15,670.00) in United States currency seized on or about

March 27, 2018 from 3 Oregon Trail, Waterford, New York 12188; (ii) three hundred ninety thousand one hundred eighty dollars and zero cents (\$390,180.00) in United States currency seized on or about March 27, 2018 from 3 Oregon Trail, Waterford, New York 12188; and (iii) one hundred nine thousand seven hundred twenty-seven dollars and zero cents (\$109,727.00) in United States currency seized on or about March 27, 2018 from the 3 Oregon Trail, Waterford, New York 12188.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
October 22, 2018

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Karin Orenstein
Assistant United States Attorney
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